

**U.S. Department of the Interior
Bureau of Land Management
Kremmling Field Office
P.O. Box 68
Kremmling, CO 80459**

ENVIRONMENTAL ASSESSMENT

NUMBER: CO-120-2007-53-EA

PROJECT NAME: Special Recreation Permit (Gravity Play Sports)

LEGAL DESCRIPTION:

T. 1 S., R. 82 W., Secs. 12,13, 22, 23, 24, 25, 26, 27, 28, 35, 36;
T. 1 S., R. 81 W., Secs. 18,19;
T. 2 S., R. 82 W., Secs.1, 2, 3, 4, 5, 6, 7, 8, 11, 12, 13, 14, 24, 25, 36;
T. 2 S., R. 81 W., Secs. 5, 6, 8, 9, 16, 21, 28, 31, 33;
T. 3 S., R. 81 W., Secs. 4, 5, 6

APPLICANT: Gravity Play Sports

DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES:

Proposed Action: The Proposed Action is to issue a commercial, competitive Special Recreation Permit (SRP) to Gravity Play Sports to organize and conduct an adventure race where contestants ride mountain bikes, run, and paddle kayaks. There would be 2 race courses, a short and long, that would start on private land at Rancho del Rio on private land (see Attachment #1 for project map). There would be approximately 2 miles of BLM-administered 2 track roads and ¼ mile of single track trail used.

The short course would begin with a biking leg that would travel east on Eagle County Road (ECR) 11 into Grand County on Grand County Road (GCR) 1. The course would turn west on the BLM two-track road that accesses the hot springs. The course would then continue east on a short piece of BLM single track trail that connects with Grand County Road 11 near the bridge over Sheephorn Creek and continue on GCR 11 to the Radium Recreation Site. The contestants would then transition to the running section, which would use GCR 11 east and south of Radium to GCR 1, east to the two track road to the hot springs and follow the route the biking section used back to Radium. The final section of the short course would be a paddle section from Radium to Rancho del Rio on the Colorado River.

The first leg of the long course would also be a bike ride. The course would go east on ECR 11 to Sheephorn Creek, then turn south up Sheephorn Creek and make a large loop up onto the forest and back to the Trough Road (GCR 1). The course would continue east on the Trough

Road to the Pumphouse Recreation Site. The contestants would transition to kayaks and paddle from Pumphouse to Radium. At Radium, the contestants would run the same course as the contestants in the short course (up the county road to the Trough Road to the hot springs road and back to Radium). The final leg of the long course would be a paddle from Radium to Rancho del Rio.

The start/finish staging area would be on private land at Rancho del Rio. There would be three checkpoints on BLM lands, one at the Radium Recreation Site, one at the Pumphouse Recreation Site, and one adjacent to the Trough Road at the intersection with the road to the hot springs. The check points would consist of a couple of vehicles and a table to check teams that pass through the check points. The contestant's support vehicles would be at the transition areas. The transition areas would be at the Radium Recreation Site (in the picnic site north of the parking lot) and the Pumphouse Recreation Site (in the Group Camp Site adjacent to Launch #3).

The proponent anticipates 200 plus participants. Participants would be organized into teams that would travel together. All team members would need to pass through check points before the other team members could continue.

The event would be held on Saturday, September 8, 2007.

The event would require BLM time to monitor parking at the staging areas and at the single track trail section. BLM would stipulate that the proponent would notify other users of the event by posting notices at both Pumphouse and Radium one week prior to the event.

No Action Alternative: The No Action Alternative would be to not issue a Special Recreation Permit to Gravity Play Sports for an adventure race.

PURPOSE AND NEED FOR THE ACTION:

The purpose of the project is the BLM is considering an application for a special recreation permit. Specifically, the BLM is considering whether to authorize the proposed adventure race. A recreation objective within the Kremmling Resource Management Plan (RMP) is "to ensure the continued availability of outdoor recreation opportunities which the public seeks and which are not readily available from other sources, to reduce the impacts of recreation use on fragile and unique resource values, and to provide for visitor safety, and resource interpretation. Thus, the BLM is considering whether the proposed event meets the need to provide outdoor recreation opportunities which are not readily available to the public.

PLAN CONFORMANCE REVIEW: The Proposed Action is subject to and has been reviewed for conformance with the following plan (43 CFR 1610.5, BLM 1617.3):

Name of Plan: Kremmling Resource Management Plan (RMP), Record of Decision (ROD)

Date Approved: December 19, 1984; Updated February 1999

Decision Number/Page: decision #7 Recreation Resource Management/page 11

Decision Language: “Special Recreation Permits for commercial recreation use of public lands and related waters will continue to be issued and administered in accordance with the BLM policy”

Standards for Public Land Health: In January 1997, Colorado Bureau of Land Management (BLM) approved the Standards for Public Land Health. Standards describe conditions needed to sustain public land health and relate to all uses of the public lands. The following are the approved standards:

Standard	Definition/Statement
#1 Upland Soils	Upland soils exhibit infiltration and permeability rates that are appropriate to soil type, climate, land form, and geologic processes. Adequate soil infiltration and permeability allows for the accumulation of soil moisture necessary for optimal plant growth and vigor, and minimizes surface runoff.
#2 Riparian Systems	Riparian systems associated with both running and standing water, function properly and have the ability to recover from major surface disturbances such as fire, severe grazing, or 100-year floods. Riparian vegetation captures sediment, and provides forage, habitat and bio-diversity. Water quality is improved or maintained. Stable soils store and release water slowly.
#3 Plant and Animal Communities	Healthy, productive plant and animal communities of native and other desirable species are maintained at viable population levels commensurate with the species and habitat’s potential. Plants and animals at both the community and population level are productive, resilient, diverse, vigorous, and able to reproduce and sustain natural fluctuations, and ecological processes.
#4 Threatened and Endangered Species	Special status, threatened and endangered species (federal and state), and other plants and animals officially designated by the BLM, and their habitats are maintained or enhanced by sustaining healthy, native plant and animal communities.
#5 Water Quality	The water quality of all water bodies, including ground water where applicable, located on or influenced by BLM lands will achieve or exceed the Water Quality Standards established by the State of Colorado. Water Quality Standards for surface and ground waters include the designated beneficial uses, numeric criteria, narrative criteria, and anti-degradation requirements set forth under State law as found in (5 CCR 1002-8), as required by Section 303(c) of the Clean Water Act.

Because a standard exists for these five categories, a finding must be made for each of them in the environmental analysis. These findings are located in specific elements below or in the Interdisciplinary Team Analysis Review Record and Checklist (IDT-RRC) (Appendix 1).

AFFECTED ENVIRONMENT / ENVIRONMENTAL CONSEQUENCES / MITIGATION MEASURES:

CRITICAL ELEMENTS: The following critical elements: Air Quality, Areas of Critical Environmental Concern, Environmental Justice, Farmlands- Prime and Unique, Floodplains, Water Quality, Wastes- Hazardous or Solid, Wetlands and Riparian Zones, Wild and Scenic Rivers, and Wilderness, etc. were evaluated and determined that they were not present or that there would be no impact to them from the Proposed Action or No Action Alternative. See IDT-RRC in Appendix 1 for further information.

The following critical elements were determined to be potentially impacted and were carried forward for analysis from the IDT-RRC in Appendix 1.

CULTURAL RESOURCES

Affected Environment: Activities along the Trough Road (CR1) and the road to Radium (CR11) are well maintained and improved roads that do not need cultural clearance. A cultural clearance has been completed on a portion of the trail/two-track road leading from CR1 to CR11 in 2004 (Report #CR-04-10) and the remainder of the two-track road was surveyed for this undertaking (Report #CR-08-14). No new cultural resources were identified.

Environmental Consequences/Mitigation: The proposed action is a no effect, no historic properties affected.

INVASIVE, NON-NATIVE SPECIES

Affected Environment: The proposed route contains a minor amount of invasive, non-native species along the proposed routes.

Environmental Consequences/Mitigation: Since the proposed action is along established routes and no ground disturbance would occur, the proposed action should have no effect on the presence of invasive, non-native species.

NATIVE AMERICAN RELIGIOUS CONCERNS

Affected Environment: No tribal consultation was initiated because the activities identified are taking place on established county roads, established two-track road and in the Colorado River. All activities are restricted to running, walking and biking, and, do not involve any off road activities or ground disturbance.

Environmental Consequences/Mitigation: There will be effect to the proposed action.

NON-CRITICAL ELEMENTS: The following non-critical elements were determined to be potentially impacted and were carried forward for analysis from the IDT-RRC in Appendix 1.

SOILS (includes a finding on Standard 1)

Affected Environment: The soils in the general vicinity were formed in hot dry climates, with several areas of rock outcrops and steep slopes. In pinyon/juniper areas, the understory vegetation is sparse. Disturbed soils can be easily eroded in these areas. Historically, many jeep trails were created by hunters in the Radium area, with rutted roads and gullies remaining. Much of the race, however, is planned for existing county roads where there would be few new impacts to soils from the race. The most primitive road on BLM is located in Sections 23 & 24, T. 1 S., R. 82 W.; a user-created route with no maintenance. The road's overall route follows the contours of the slope and has a few steep segments. From looking at an older (1970s) trail map, the road was the earliest route to the hot springs flats. The road has sections with poor drainage where runoff travels the road, creating ruts and exposing large rocks. General travel management and road maintenance is needed in the flats area, and will be addressed in the scheduled resource plan amendment.

Only about a ¼ mile of the race is planned to be on a footpath, and would be used by runners and bikers. The planned route on a footpath is along a ridge and then down a steep poorly vegetated slope. The slope currently has two trails- one that is more straight down the hill, slightly gullied, with loose rocks and soil in the lower portion of the trail. The rock and soil deposits from runoff correspond with a slight cross slope alignment, and the trail's raised outer edge keeps runoff on the trail. The more easterly route travels across the slope uphill of the other trail, before plunging straight down. The straight section has some rills, but runoff tends to spread across a larger bare area. There are no loose deposits on this portion of the east trail.

The rest of the planned event would occur on county roads and developed campground areas. This additional use would be immeasurable on these areas.

Environmental Consequences/Mitigation: The proposed race would occur on routes that are currently open to public use, and generally used by motorized vehicles. The additional use by bikes, runners, and limited motorized support would not be a significant impact to much of the area. On the primitive hot springs road, runners and bikers would most likely choose the higher less eroded track of the two track due to a smoother path, unless they were trying to pass another competitor. The road is seasonally closed to help reduce damage during wet soil conditions.

The portion of single track, however, could be impacted by the planned use. Ideally, the route should be closed and a new route located with a more sustainable (and safer) path. Recreation's requirement of bikers dismounting and carrying their bikes would reduce the soil displacement by the tires. All riders should dismount prior to the "gate" formed by two juniper trees uphill from the wood post. One downhill route should be used, with the other route marked closed.

Due to the sparse vegetation and the erodibility of the soils, all intersections should be clearly flagged to reduce the possibility of new routes being created by competitors who missed the race's trail. The race should not occur during wet soil conditions, due to the increased soil compaction and displacement on the more primitive road, the footpath, and the campground areas.

Finding on the Public Land Health Standard for upland soils: Most of the proposed race occurs on areas that are meeting the Standard for upland soils. Due to using existing roads and campground areas, the proposed race, with stipulations, would not affect the area's ability to continue to meet the standard.

VEGETATION (includes a finding on Standard 3)

Affected Environment: The proposed route would pass through numerous vegetation communities, including sagebrush steppe, lodgepole pine forests, grasslands, and mixed aspen-conifer woodlands.

Environmental Consequences/Mitigation: Since the proposed route would remain on existing routes, no impacts to the vegetation would occur with implementation of the Proposed Action or No Action alternatives

Finding on the Public Land Health Standard for plant and animal communities (partial, see also Wildlife, Aquatic and Wildlife, Terrestrial): The area surrounding the proposed routes are not

included in livestock grazing allotments and, therefore, have not been assessed for compliance with the Standards for Public Land Health in Colorado.

RECREATION:

Affected Environment: The proposed action is within the Upper Colorado River Special Recreation Management Area (SRMA). There are over 40,000 visitor use days within SRMA annually. Use is concentrated during the summer months (June – August). The primary use is commercial rafting/floatboating operations. There is a trend of increased commercial float fishing use occurring. BLM manages 3 river access sites within the SRMA, the Confluence, Pumphouse and Radium. Most of the use within the SRMA uses either the Pumphouse site or the Radium site.

Environmental Consequences/Mitigation: The proposed action would be consistent with BLM management of the SRMA for recreation opportunities. The large number of participants could create potential conflicts with other users. Staging the transition area at Pumphouse at the Group Campsite and at the picnic area at Radium will help reduce the impacts. Bicycles descending the single track section onto Grand County Road 11 by Sheephorn Creek could cause trail damage and could create a safety hazard. Requiring participants to dismount and carry their bikes down the hill would reduce the impacts.

PALEONTOLOGY

Affected Environment: The proposed courses are mapped on four distinct geologic units. They are the TBR (Rhyolitic Rocks), Tbb (Basalt), Kpcs (Chinle and State Bridge formations) and KC (the Colorado Group). The Rhyolitic and Basalt geology are classified as Class IV which is defined as: "Fossils are not known for this geologic unit and there is little likelihood of their occurrence." The Chinle, State Bridge and Colorado Group are classified as Class II which is defined as: "Fossils of scientific significance are occasionally found in the formation within the Craig District.

Environmental Consequences/Mitigation: The nature of the race is such that some soil and ground disturbance can be anticipated during the running and biking portions of the event. This disturbance may be sufficient to expose fossils. The remainder of the event is either completed on the water or along existing roads and two tracks, and this is not anticipated to create any additional disturbance. The KFO paleontology lead will conduct reconnaissance inventory of the routes after the event and before the next scheduled event to identify any exposed resources and identify potential impacts. Standard BLM discovery stipulations are attached to this environmental assessment and the special recreation use permit.

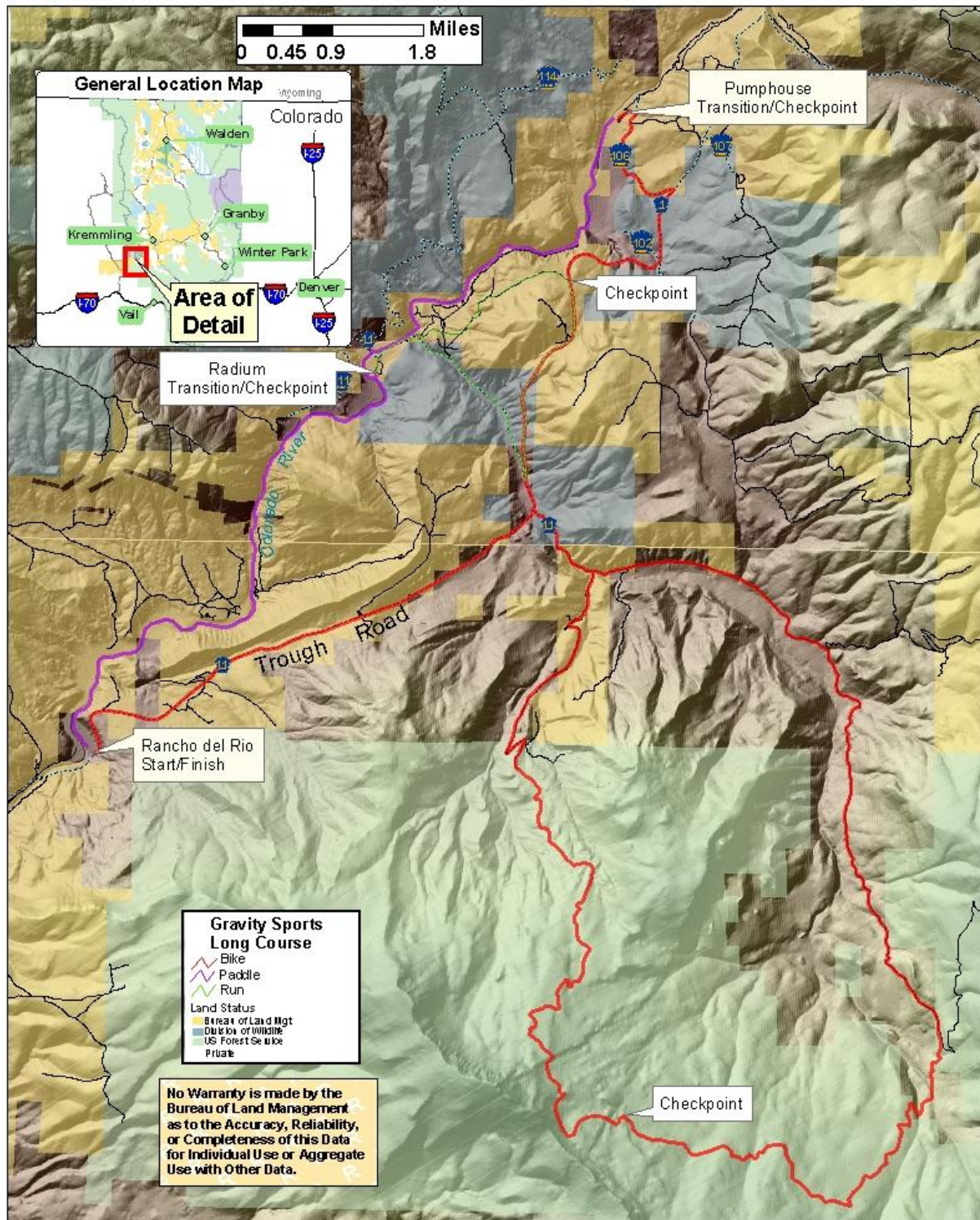
CUMULATIVE IMPACTS SUMMARY: All resource values have been evaluated for cumulative impacts. It has been determined that there would be no cumulative impacts.

PERSONS / AGENCIES CONSULTED: Colorado Division of Wildlife (Doug Gilham), Rancho del Rio (Jeff Gibson), Grand County (Ken Haynes), Eagle County (Mike Gruber) US Forest Service (Brandon Mitchell)

INTERDISCIPLINARY REVIEW: See IDT-RRC in Appendix 1.

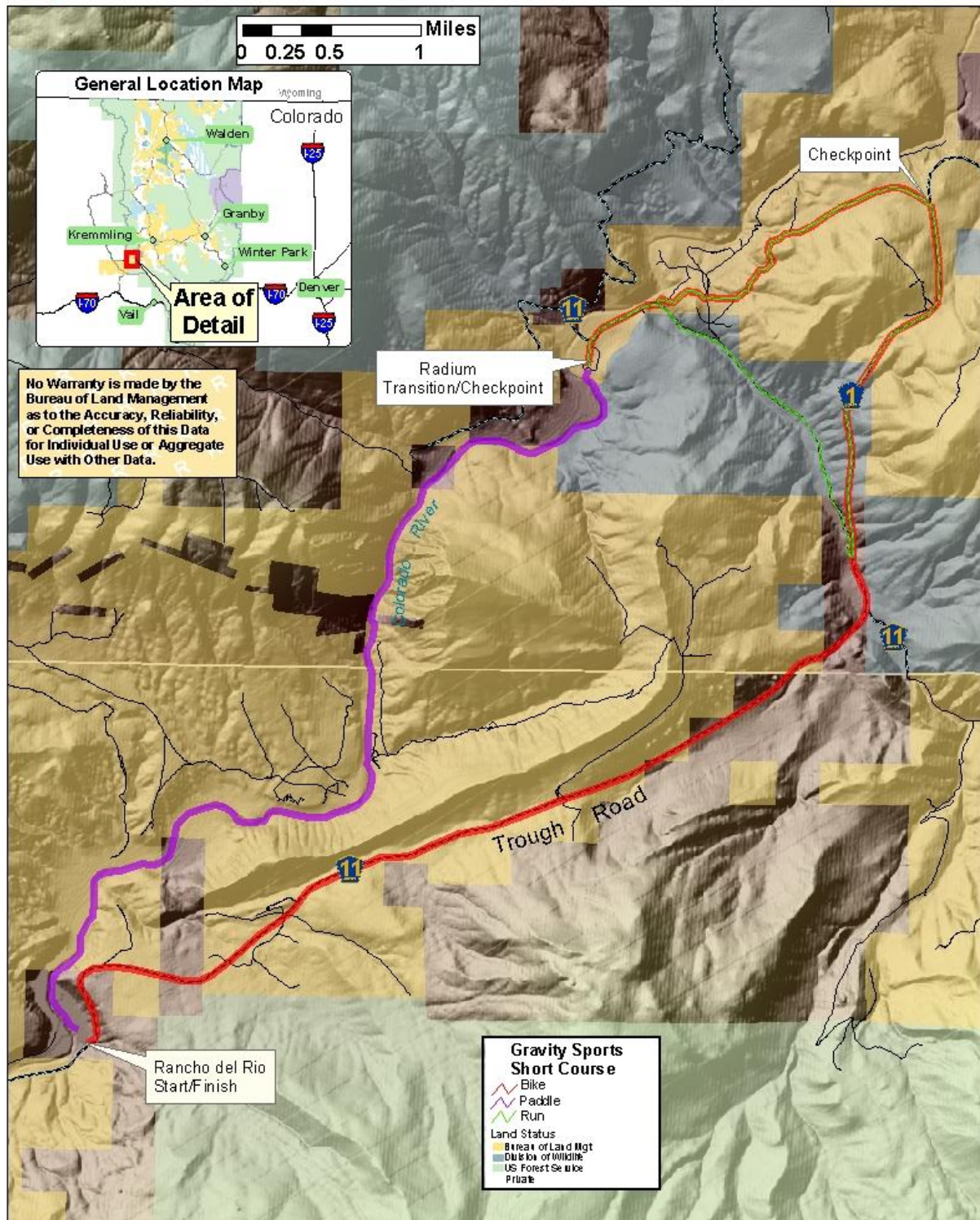


Gravity Play SRP Proposal





Gravity Play SRP Proposal



FONSI

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Based on the analysis of potential environmental impacts contained in the attached environmental assessment, and considering the significance criteria in 40 CFR 1508.27, I have determined that the Proposed Action will not have a significant effect on the human environment. An environmental impact statement is therefore not required.

DECISION RECORD

DECISION:

It is my decision to authorize a Special Recreation Permit as described in the attached EA. This decision is contingent on meeting all mitigation measures and monitoring requirements listed below.

RATIONALE:

The proposed adventure race is consistent with recreation management objectives within the Upper Colorado River Special Recreation Management Area and the stipulations attached to the Special Recreation Permit will mitigate the identified impacts resulting from the activity.

MITIGATION MEASURES:

The Special Recreation Permit will include the following stipulations:

1. One single track trail that connects the two track routes on the hot springs flats with Grand County Road (GCR) 11 will be clearly marked so that participants choose the correct trail.
2. Participants will be required to dismount and carry their bikes down the single track trail connecting to GCR 11.
3. The course will be marked between the GCR 1 and GCR 11 as necessary to keep participants on existing roads and trails.
4. No cross country travel is permitted by participants and race organizers.
5. The following cultural and paleontological stipulations:

Standard Cultural & Paleontological stipulations:

The holder shall immediately bring to the attention of the Authorized Officer any and all antiquities, or other objects of historic, paleontological, or scientific interest including but not limited to, historic or prehistoric ruins or artifacts DISCOVERED as a result of operations under this authorization (16 U.S.C. 470.-3, 36 CFR 800.112). The holder shall immediately suspend all activities in the area of the object and shall leave such discoveries intact until written approval to proceed is obtained from the Authorized Officer. Approval to proceed will be based upon evaluation of the object(s). Evaluation shall be by a qualified professional selected by the Authorized Officer from a Federal agency insofar as practicable (BLM Manual 8142.06E). When not practicable, the holder shall bear the cost of the services of a non-Federal professional.

Within five working days the Authorized Officer will inform the holder as to:

- Whether the materials appear eligible for the National Register of Historic Places;
- The mitigation measures the holder will likely have to undertake before the site can be used (assuming in situ preservation is not necessary); and,
- A timeframe for the Authorized Officer to complete an expedited review under 36 CFR 800.11 to confirm, through the State Historic Preservation Officer, that the findings of the Authorized Officer are correct and that mitigation is appropriate.

If the holder wishes, at any time, to relocate activities to avoid the expense of mitigation and/or the delays associated with this process, the Authorized Officer will assume responsibility for whatever recordation and stabilization of the exposed materials may be required. Otherwise, the holder will be responsible for mitigation costs. The Authorized Officer will provide technical and procedural guidelines for the conduct of mitigation. Upon verification from the Authorized Officer that the required mitigation has been completed, the holder will then be allowed to resume construction.

Antiquities, historic, prehistoric ruins, paleontological or objects of scientific interest that are outside of the authorization boundaries but directly associated with the impacted resource will also be included in this evaluation and/or mitigation.

Antiquities, historic, prehistoric ruins, paleontological or objects of scientific interest, identified or unidentified, that are outside of the authorization and not associated with the resource within the authorization will also be protected. Impacts that occur to such resources, which are related to the authorizations activities, will be mitigated at the holder's cost.

Pursuant to 43 CFR 10.4(g), the holder of this authorization must notify the Authorized Officer, by telephone, with written confirmation, immediately upon the discovery of human remains, funerary items, sacred objects, or objects of cultural patrimony. Further, pursuant to 43 CFR 10.4 (c) and (d), you must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the Authorized Officer.

COMPLIANCE/MONITORING:

BLM recreation staff will monitor the event on the day of the race to ensure permit stipulations are met. BLM paleontology lead will survey the course following the event to determine if any resources were uncovered by the activity.

NAME OF PREPARER: Andy Windsor

NAME OF ENVIRONMENTAL COORDINATOR: Joe Stout

DATE: 9/6/2007

SIGNATURE OF AUTHORIZED OFFICIAL: /s/ David Stout

DATE SIGNED: 9/7/07

ATTACHMENTS:

1). Project Map

APPENDICES:

Appendix 1 – Interdisciplinary Team Analysis Review Record and Checklist

Appendix 1

INTERDISCIPLINARY TEAM ANALYSIS REVIEW RECORD AND CHECKLIST:

Project Title: Special Recreation Permit Proposal (Gravity Play Sports)

Project Leader: Andy Windsor

Date Submitted for Comment: August 20, 2007

Due Date for Comments: September 4, 2007

Scoping Needs/Interested or Affected Publics: Grand County, Eagle County, private land owner (Rancho del Rio), Colorado Division of Wildlife

Consultation/Permit Requirements:

Consultation	Date Initiated	Date Completed	Responsible Specialist/ Contractor	Comments
Cultural/Archeological Clearance/SHPO	N/A	N/A	B. Wyatt	
Native American	N/A	N/A	B. Wyatt	
T&E Species/FWS	N/A	N/A	M. McGuire	
Permits Needed (i.e. Air or Water)	N/A	N/A	P. Belcher	

(NP) = Not Present

(NI) = Resource/Use Present but Not Impacted

(PI) = Potentially Impacted and Brought Forward for Analysis.

NP NI PI	Discipline/Name	Date Review Comp.	Initials	Review Comments (required for Critical Element NIs, and for elements that require a finding but are not carried forward for analysis.)
CRITICAL ELEMENTS				
NI	Air Quality Belcher	8/31/07	PB	The Proposed Action and the No Action Alternative would not impact air quality.
NP	Areas of Critical Environmental Concern Stout	8/31/07	JS	There are no Areas of Critical Environmental Concern in the proximity of the proposed project area.
PI	Cultural Resources Rupp Wyatt	9/4/07	BW	See analysis

NP	Environmental Justice	Stout	8/31/07	JS	According to the most recent Census Bureau statistics (2000), there are no minority or low income communities within the Kremmling Planning Area.
NP	Farmlands, Prime and Unique	Belcher	8/31/07	PB	There are no farmlands, prime or unique, in the proximity of the proposed project area.
NI	Floodplains	Belcher	8/31/07	PB	The Proposed Action would not affect the flood hazard or functionality of the Colorado River floodplain.
NI	Invasive, Non-native Species	Johnson Torma	8/29/07	RJ	There is no potential impact to the invasive, non-native species within the project area.
NI	Migratory Birds	McGuire	8/20/07	MM	Migratory birds are present but not impacted due to the short duration of the event and the use of existing roads and trails.
NI	Native American Religious Concerns	Wyatt Wyatt	9/4/07	BW	See Native American section
NI	T/E, and Sensitive Species (Finding on Standard 4)	McGuire	8/20/07	MM	Sensitive species are present but not impacted due to the short duration of the event and the use of existing roads and trails. Finding: No impact.
NI	Wastes, Hazardous and Solid	Hodgson	8/28/07	KH	There are no known quantities of wastes, hazardous or solid, located on BLM-administered lands in the proposed project area, and there would be no wastes generated as a result of the Proposed Action or No Action alternative.
NI	Water Quality, Surface and Ground (Finding on Standard 5)	Belcher	8/31/07	PB	Finding: The race courses primarily occur where other public and commercial uses are occurring with much larger numbers than the race participants. With stipulations in Soils Section, water quality will not be impacted by the race.
NP /NI	Wetlands & Riparian Zones (Finding on Standard 2)	Belcher	8/31/07	PB	Finding: The proposed bike and running portions of the race are located in upland areas or on existing roads adjacent to riparian areas. There would be no additional or new impact from the Proposed Action.
NP	Wild and Scenic Rivers	Sterin	8/22/07	BS	The BLM has determined that this section of the Colorado River is eligible for Wild and Scenic River Status. The Proposed Action would not adversely affect the Outstandingly Remarkable Values or free flowing classification because development already exists within the project area. Thus, there would be no impact.
NP	Wilderness	Sterin	8/22/07	BS	There is no designated Wilderness or Wilderness Study Areas in the proximity of the proposed project area.
NON-CRITICAL ELEMENTS (A finding must be made for these elements)					
PI	Soils (Finding on Standard 1)	Belcher	8/31/07	PB	Finding: See write-up
NI	Vegetation (Finding on Standard 3)	Johnson Torma Jack	8/29/07	RJ	Finding: Since the Proposed Action would be restricted to existing routes, there would be no impact to the vegetation in the project area.
NI	Wildlife, Aquatic (Finding on Standard 3)	McGuire	8/20/07	MM	Aquatic wildlife is present but not impacted due to the short duration of the event and the proposed use on the river is not unlike other activities that occur. Finding: No impact.

NI	Wildlife, Terrestrial (Finding on Standard 3)	McGuire	8/20/07	MM	Terrestrial wildlife is present but not impacted due to the short duration of the event and the use of existing roads and trails. Finding: No impact.
OTHER NON-CRITICAL ELEMENTS					
NI	Access/Transportation	Windsor	8/31/07	AW	Event will use routes that are open to the proposed activities
NI	Fire	Wyatt	9/4/07	BW	No impact to fire
NI	Forest Management	Rosene Zayat	8/30/07	RAR	No impact to forest management.
NI	Geology and Minerals	Hodgson	8/28/07	KH	No impact.
NI	Hydrology/Water Rights	Belcher	8/31/07	PB	Soils Section summarizes hydrology concerns. No impacts to water rights.
NI	Paleontology	Rupp	9/4/2007	FGR	* See write up.
NI	Noise	Windsor	9/5/07	AW	No impacts resulting from noise.
NP	Range Management	Johnson Torma Jack	9/6/07	RJ	Not Present
NI	Lands/ Realty Authorizations	Cassel	8/23/2007	SC	There are no leases or permits in the locations of the proposed action. There are seven ROWs in the location of the proposed action. COC-36328 & COC 43109 to Eagle County and COC-54615 to Grand County for their portion of the Trough Rd. COC-33482 to Century Tel for telephone lines, COC-53546 to Yampa Valley Elec. for powerline, COC 0 22257 to USFS for an access road and COC 0 122341 to Union Pacific Railroad for a rail line. There should be no impacts to any of these ROWs if the contestants stay off of the railroad.
PI	Recreation	Windsor	8/16/07	AW	See analysis
NI	Socio-Economics	Stout	8/31/07	JS	There would be no socio-economic impacts.
NI	Visual Resources	Windsor	8/31/07	AW	The event will pass through both Class II and III. There will be no impacts to visual resources.
NI	Cumulative Impact Summary	Stout	8/31/07	JS	See cumulative impact section
FINAL REVIEW					
	P&E Coordinator	Stout			
	Field Manager	D. Stout			